



April 18, 2000

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Byron Station, Units 1 and 2
Facility Operating License Nos. NPF-37 and NPF-66
NRC Docket Nos. STN 50-454 and STN 50-455

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Request to Implement a Portion of the 1995 Edition and 1996 Addenda of the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants Regarding Appendix II, "Check Valve Condition Monitoring Program"

Reference: Nuclear Regulatory Commission Final Rule 10CFR Part 50 "Industry Codes and Standards; Amended Requirements," (64 FR 51370) dated September 22, 1999

10CFR50.55a(f), "Inservice testing requirements," paragraph (4) requires that inservice testing (IST) of certain American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel (B&PV) Code Class 1, 2, and 3 components be performed in accordance with Section XI, "Rules for Inservice Inspection of Nuclear Plant Components," of the ASME Code and applicable addenda incorporated by reference in paragraph (b) of 10CFR50.55a, "Codes and standards." Paragraph (4)(iv) of 10CFR50.55a(f) indicates that subsequent editions and addenda of the ASME Code that are incorporated by reference in paragraph (b) of 10CFR50.55a may be

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implemented by a licensee subject to the NRC's approval. Paragraph (4)(iv) further states that portions of editions or addenda may be used provided that all related requirements of the respective editions or addenda are met.

The above referenced final rule publication revised, in part, the IST requirements for check valves. In the final rule, the NRC amended its regulations to incorporate by reference the 1995 Edition and 1996 Addenda of the ASME Code for Operation and Maintenance of Nuclear Power Plants (i.e., OMa – 1996 Code). The rule also permits the use of a check valve monitoring program (i.e., Appendix II, "Check Valve Condition Monitoring Program" to the OMa – 1996 Code) in lieu of certain provisions of Subsection Inservice Testing Code (ISTC) of the OMa – 1996 Code.

The final rule publication noted that the NRC will favorably consider a request by a licensee under 10CFR50.55a(f)(4)(iv), to apply Appendix II for check valves in advance of incorporating the 1995 Edition with the 1996 Addenda of the ASME OM Code as its Code of record, if the licensee commits to the following provisions.

1. The modifications to Appendix II contained in the rule have been satisfied. These modifications are as follows.
 - A. Valve opening and closing functions must be demonstrated when flow testing or examination methods (e.g., nonintrusive or disassembly and inspection) are used.
 - B. The initial interval for tests and associated examinations will not exceed two fuel cycles or 3 years, whichever is longer. Any extension of this interval will not exceed one fuel cycle per extension with the maximum interval not to exceed 10 years. Trending and evaluation of existing data will be used to reduce or extend the time interval between tests.
 - C. If the Appendix II condition monitoring program is discontinued, then the requirements of ISTC 4.5.1 through 4.5.4 must be implemented.
2. All portions of the 1995 Edition with the 1996 Addenda of the ASME OM Code that apply to check valves are implemented for the remaining check valves not included in the Appendix II program.

The implementation of the 1995 Edition with the 1996 Addenda of the ASME OM Code, including Appendix II, will improve the performance of check valves and will optimize testing, examination and preventative maintenance. Appendix II properly focuses testing, monitoring, or examination activities on problem valves and away from valves that exhibit acceptable performance. Condition monitoring, as described in Appendix II, is a new Code approach with a promise of better detection of check valve degradation, improved valve performance, and maintaining reliable component capability over extended intervals, while adjusting test and examination intervals. The modifications to Appendix II contained in the rule provide for a safe and prudent progression of extending test and examination intervals consistent with historical experience and performance expectations. In addition, the modifications to Appendix II noted above allow a licensee to conduct self-compliance inspections and minimize the expenditure of owner and NRC resources.

In accordance with 10CFR50.55a(f)(4)(iv), Commonwealth Edison (ComEd) Company requests approval, for all ComEd Nuclear Stations, to implement a portion of the ASME OMa-1996 Code including Appendix II, as it applies to check valves only, in advance of incorporating the 1995 Edition with the 1996 Addenda of the ASME OM Code, in its entirety, as the code of record.

We request the NRC's approval to implement the check valve portion of the ASME OMa-1996 Code including Appendix II, by July 15, 2000, in order to support the inservice testing of check valves scheduled to be examined during the fall refueling outages of 2000. Implementation of the ASME OMa-1996 Code and Appendix II and the required modifications will be phased in for all check valves at all ComEd nuclear stations. Full implementation of the ASME OMa-1996 Code will be completed by September 1, 2001, at which time copies of updated stations' IST Program Plans will be provided to the NRC for information. During the transition to ASME OMa-1996 Code, ComEd will not selectively apply current code of record requirements and ASME OMa-1996 Code requirements for any individual check valve.

Should you have any questions concerning this letter, please contact Ms. Marcia Lesniak at (630) 663-6484.

Respectfully,



R. M. Krich
Vice President - Regulatory Services

Attachments: Braidwood Station Relief Request RV-5
Byron Station Relief Request RV-9
Dresden Nuclear Power Station Relief Request RV-00D
LaSalle County Station Relief Request RV-10
Quad Cities Nuclear Power Station Relief Request RV-00D

cc: Regional Administrator - Region III
NRC Senior Resident Inspector - Byron Station
NRC Senior Resident Inspector - Braidwood Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station